



Entered on Docket
August 09, 2010


Hon. Mike K. Nakagawa
United States Bankruptcy Judge

WILDE & ASSOCIATES
Gregory L. Wilde, Esq.
Nevada Bar No. 004417
212 South Jones Boulevard
Las Vegas, Nevada 89107
Telephone: 702 258-8200
Fax: 702 258-8787
Wells Fargo Bank, N.A.
10-72232

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In Re:

Steve E. Lee

BK-S-10-18735-mkn

MS Motion No. 12
Date: 7/7/10
Time: 1:30

Chapter 7

Debtor.

STIPULATION FOR ORDER VACATING AUTOMATIC STAY

IT IS HEREBY STIPULATED by and between the parties herein, through counsel undersigned, that all stays and injunctions, including the automatic stays under U.S. Bankruptcy Code Section 362(a), are hereby vacated effective immediately with respect to Secured Creditor's promissory note dated October 9, 2006 in the principal sum of \$189,000.00 ("Promissory Note" herein), secured by a Real Property Trust Deed of same date ("Trust Deed" herein) upon property generally described as 3312 Mary Ann Avenue, Las Vegas, NV 89101, and legally described as follows:

1 Lot 4, Block 4 of College Park No 25, Map Book 13 of Plats, Page 25, Clark County,
2 Nevada

3 Debtor herein, Steven E. Lee is the Trustor on Secured Creditor's Deed of Trust.

4 FURTHER STIPULATED that the debtors have no desire to maintain or keep the
5 property and have decided to surrender their interest in the property legally described herein.

6 IT IS FURTHER STIPULATED that Movant is now permitted, in its discretion to
7 commence or conduct a Trustee's Sale, commence judicial foreclosure, or take whatever other
8 actions necessary to protect their interest in the above legally described property.

9 IT IS FURTHER STIPULATED that an Order Lifting Stay will remain in full force and
10 effect in any bankruptcy chapter to which the Debtors may convert.

11 IT IS FURTHER STIPULATED that any hearing scheduled in the matter are vacated.

12 DATED this 8th day of July, 2010.

13
14 Submitted by:

15 WILDE & ASSOCIATES

16
17 By 

18 GREGORY L. WILDE, ESQ.

19 Attorneys for Secured Creditor
20 212 South Jones Boulevard
21 Las Vegas, Nevada 89107

22 APPROVED AS TO FORM & CONTENT:

23 Gerry G. Zobrist, LTD.

24 By 

25 Gerry G. Zobrist, Esq.
26 Attorney for Debtors
6900 Westcliff Drive Ste. 801
Las Vegas, NV 89145

Nevada Bar No.7223

1 In accordance with Local Rule 9021, the undersigned counsel certifies as follows (check one):

2 ☐ The court waived the requirements of LR 9021.

3 ☐ No parties appeared or filed written objections, and there is no trustee appointed in the case.

4 ☐ No parties appeared or filed written objections, and the trustee is the movant.

5 ☒ This is a chapter 7 or 13 case, and either with the motion, or at the hearing, I have delivered a
6 copy of this proposed order to all counsel who appeared at the hearing, and any trustee
7 appointed in this case, any unrepresented parties who appeared at the hearing, and each has
8 approved or disapproved the order, or failed to respond, as indicated below:

9 Debtor's counsel:

10 ☒ approved the form of this order ☐ disapproved the form of this order

11 ☐ waived the right to review the order and/or ☐ failed to respond to the document

12 ☐ appeared at the hearing, waived the right to review the order

13 ☐ matter unopposed, did not appear at the hearing, waived the right to review the order

14 Trustee:

15 ☐ approved the form of this order ☐ disapproved the form of this order

16 ☒ waived the right to review the order and/or ☐ failed to respond to the document

17 ☐ This is a chapter 9, 11, or 15 case, and I have delivered a copy of this proposed order to all
18 counsel who appeared at the hearing, and any trustee appointed in this case any unrepresented
19 parties who appeared at the hearing, and each has approved or disapproved the order, or failed to
20 respond, as indicated below.

21 Debtor's counsel:

22 ☐ approved the form of this order ☐ disapproved the form of this order

23 ☐ waived the right to review the order and/or ☐ failed to respond to the document

24 ☐ appeared at the hearing, waived the right to review the order

25 ☐ matter unopposed, did not appear at the hearing, waived the right to review the order

26 Trustee:

☐ approved the form of this order ☐ disapproved the form of this order

☐ waived the right to review the order and/or ☐ failed to respond to the document

☐ I certify that I have served a copy of this order with the motion, and no parties appeared or filed
written objection.

Submitted by:

/s/ Gregory L. Wilde, Esq.

Gregory L. Wilde, Esq.

Attorney for Secured Creditor